

From: Chu, Xiangyu
Sent time: 09/24/2014 11:11:35 AM
To: Jiles, Jordana
Subject: Re: Reminder: ICDS/CCDS forms due COB 10/3
Attachments: Case Conclusion Data Sheet.docx

Hi Jo,

Here is the CCDS for Flint Hills. I don't have the date for the prefilling letter, can you look it up? If not, I'll look when I'm back in the office on Monday. Thanks

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From: Jiles, Jordana
Sent: Monday, September 22, 2014 1:14 PM
To: Chu, Xiangyu
Subject: RE: Reminder: ICDS/CCDS forms due COB 10/3

Hope your day is going well!

From: Chu, Xiangyu
Sent: Monday, September 22, 2014 1:13 PM
To: Jiles, Jordana
Subject: Re: Reminder: ICDS/CCDS forms due COB 10/3

Can you send me a CCDS form. Thanks

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From: Jiles, Jordana
Sent: Monday, September 22, 2014 12:02 PM
To: Boller, Jack; Chu, Xiangyu; Downey, Scott; Jones, Jon; Magolske, Peter; McNeill, Kristin; Schanilec, Kevin; Wells, Melba; Williams, Cheryl B.
Subject: Reminder: ICDS/CCDS forms due COB 10/3

Good afternoon everyone!

This is a friendly reminder that all ICDS and CCDS forms are due by COB next Friday, 10/03/2014. Please do not hesitate to contact me if I may be of assistance.

Thank you!

Jo

From: Jiles, Jordana
Sent: Friday, September 05, 2014 11:52 AM
To: Brown, Christy; Castrilli, Laura; Hedeem, Roberta; Meyer, Linda; Palumbo, Janice
Subject: ICDS forms due COB 10/3

Good day everyone!

Can you believe the end of FY14 is fast approaching? This is a friendly reminder that if you reviewed documents in response to an information request, that is considered a non-financial record review. Please submit an ICDS form for record review(s) completed during 10/01/2013 - 09/30/2014 by COB Friday, 10/03/2014. Please do not hesitate to contact me if you have questions or need clarification.

Enjoy your weekend!

Jo

Jordana Jiles
RCRA Data Manager
Regional Compliance Screener

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RCRA Subtitle C
Case Conclusion Data Sheet

CASE INFORMATION
Case Name: Flint Hills Resources Alaska, LLC
RCRA ID #: AKD000850701
Docket #: RCRA-10-2014-163

ACTION TYPE:	
<input type="checkbox"/>	Consent Decree or court order resolving a civil judicial action
<input checked="" type="checkbox"/>	Administrative Penalty Order (with/without injunctive relief)
<input type="checkbox"/>	Administrative Compliance Orders
<input type="checkbox"/>	Notice of Determination
Date of Self Disclosure Letter:	

Date Complaint/Order Issued:
Date Final Penalty Order Issued: 9/8/14

Penalty to be Paid: \$ 80,000

CASE SUMMARY: THIS WILL BE POSTED IN ECHO FOR PUBLIC. Enter the text from the press release or OECA Weekly write-up in the text box below.

<p>On September 8, 2014, Region 10 filed a consent agreement and final order that resolves RCRA hazardous waste violations at the Flint Hills Refining Alaska (Flint Hills) facility in North Pole, Alaska. The company failed to make a determination that spent groundwater pre-filters generated on site contained iron sulfide and were an ignitable and reactive hazardous waste. In June 2013, Flint Hills disposed of the waste in a dumpster at the refinery and the waste self-ignited twice before Flint Hills took measures to ensure its proper storage and disposal as hazardous waste. EPA alleged that Flint Hills stored hazardous waste at the facility without obtaining a permit or complying with conditions applicable to hazardous waste generators. Flint Hills now manages the spent groundwater pre-filters as hazardous waste. The company agreed to pay a penalty of \$80,000.</p>

Hazardous Waste Speciation Calculator Tool [Spreadsheet](#)

[FY12 CCDS Guidance - Environmental Benefits \(Word 1-10-12\)](#). This guidance includes methodologies for estimating environmental benefits from concluded enforcement cases. Changes include a “nature of remedy” approach to reporting environmental benefits which focuses on the environmental remedy rather than the statutory authority of a concluded enforcement action.

COMPLYING ACTIONS/INJUNCTIVE RELIEF

*****Please do not select more than one action if there is only one pollutant. According to the FY12 CCDS guidance, a unique pollutant amount is to be entered in ICIS in association with one complying action. The most immediate action taken to address the pollutant should be reported.**

REMOVAL AND RESTORATION (benefits derived from a complying action that results in a pollutant, contaminated media or structure, **already in the environment**, being eliminated or treated to a level required by the enforcement action.

Pollutant	Amount	Unit	Media	NEI	<input type="checkbox"/>	In-situ Treatment
				<input type="checkbox"/>	<input type="checkbox"/>	Ex-situ Treatment
				<input type="checkbox"/>	<input type="checkbox"/>	Removal of Contaminated Media
				<input type="checkbox"/>	<input type="checkbox"/>	Removal of Released Pollutants

Cost of Complying Action:

REDUCTION OF ON-GOING RELEASES: (Benefits derived from a complying action that **reduces or eliminates an on-going discharge**, emission or release of pollutant(s) into the environment.)

<input type="checkbox"/>	Reduction - Disposal Change	<input type="checkbox"/>	Reduction - Storage Change
<input type="checkbox"/>	Reduction - HW Storage Change	<input type="checkbox"/>	Reduction - Treatment
<input type="checkbox"/>	Reduction - HW Treatment	<input type="checkbox"/>	Reduction - Use Reduction
<input type="checkbox"/>	Reduction - HW Use Reduction	<input type="checkbox"/>	Reduction - Waste Containment

Pollutant	Amount	Unit	Media	NEI
				<input type="checkbox"/>
				<input type="checkbox"/>
				<input type="checkbox"/>

Cost of Complying Action:

PREVENTION OF FUTURE RELEASES: Benefits derived from a complying action that reduces or eliminates the potential for a future discharge, emission or release of pollutant(s) not already in the environment

<input checked="" type="checkbox"/>	Prevention - Proper Waste Containment	<input checked="" type="checkbox"/>	Prevention - Proper Waste Storage
<input type="checkbox"/>	Prevention - Proper Waste Disposal	<input type="checkbox"/>	Prevention - Proper Waste Transport
<input type="checkbox"/>	Prevention - Proper Waste Export	<input type="checkbox"/>	Prevention – Cathodic Protection System Maintenance/Repair

Pollutant	Amount	Unit	Media	NEI
spent groundwater pre-filters contained iron sulfide	945	lbs		<input type="checkbox"/>
				<input type="checkbox"/>
				<input type="checkbox"/>

Cost of Complying Action:

WORK PRACTICES

<input type="checkbox"/>	Work Practices - Auditing	<input type="checkbox"/>	Work Practices - Notification
<input type="checkbox"/>	Work Practices - Cease Activity	<input type="checkbox"/>	Work Practices - Permitting
<input type="checkbox"/>	Work Practices - Environmental Management Review	<input type="checkbox"/>	Work Practices - Planning
<input type="checkbox"/>	Work Practices - Financial Responsibility Requirements	<input type="checkbox"/>	Work Practices - Product Registration
<input type="checkbox"/>	Work Practices - Information Letter Response	<input type="checkbox"/>	Work Practices - Recordkeeping
<input checked="" type="checkbox"/>	Work Practices - Labeling - Identification	<input type="checkbox"/>	Work Practices - Reporting
<input checked="" type="checkbox"/>	Work Practices - Labeling - Material Management	<input type="checkbox"/>	Work Practices - Testing/Sampling
<input type="checkbox"/>	Work Practices - Manifesting	<input type="checkbox"/>	Work Practices - Training
<input type="checkbox"/>	Work Practices - Monitoring	<input checked="" type="checkbox"/>	Work Practices - Work Practices

Cost of Complying Action: \$1,000

Environmental Justice Indicators: CTRL+Click to follow this link-> [R10 EJSCREEN](#)

Under the terms of the revised EJ Technical Directive (reissued April 8, 2013) the following information applies to EPA civil regulatory and Superfund enforcement cases “initiated” starting April 1, 2013. **There are no RCRA exemptions under EJ.**

EJ Table 1: EJSCREEN Flag (Manual) (Select one)

<input type="checkbox"/>	YES	➔ If selected, proceed to EJ Table 2 & select the applicable “YES Enhanced Review” response
<input checked="" type="checkbox"/>	NO	➔ If selected, proceed to EJ Table 2 & select the applicable “YES/NO Enhanced Review” response

EJ Table 2: Enhanced Review for Potential EJ Concerns (Select one)

<input type="checkbox"/>	YES Enhanced Review - Potential EJ Concern Found	➔ If selected, proceed to EJ Table 3
<input type="checkbox"/>	YES Enhanced Review - Potential EJ Concern Not Found	➔ If selected, proceed to EJ Table 3
<input checked="" type="checkbox"/>	NO No Enhanced Review ➔ If you selected No in Table 1 <u>and</u> you do not have any EJ concerns, select No here. If you do have EJ concerns despite the No score from table 1, you can request an enhanced review based on your knowledge of the facility/area	➔ If selected, skip EJ Tables 3 & 4

EJ Table 3: Basis of EJ Determination (Select all that apply based on EJ review then proceed to EJ Table 4)

<input type="checkbox"/>	Community self-identification
<input checked="" type="checkbox"/>	EJSCREEN data ➔ <i>Pre-selected for R10; do not change</i>
<input type="checkbox"/>	EPA knowledge of community/location (including inspector observation)
<input type="checkbox"/>	Other federal government knowledge of community/location
<input type="checkbox"/>	Public input
<input type="checkbox"/>	State/local/tribal government knowledge of community location

EJ Table 4: Explanation of Basis for Potential EJ Concern Finding (Select applicable “R10 Tier 1/ 2” response or “Exempt”), *****Forward your Tier 1/ 2EJScreen review results to Jo*****

<input type="checkbox"/>	R10 Tier 1 Review: Potential EJ Concern Found	<input type="checkbox"/>	R10 Tier 2 Review: Potential EJ Concern Found
<input type="checkbox"/>	R10 Tier 1 Review: Potential EJ Concern <u>Not</u> Found	<input type="checkbox"/>	R10 Tier 2 Review: Potential EJ Concern <u>Not</u> Found
	Explanation: For Tier 1 / 2 Review, paste the Explanation provided to you by the R10 EJ Coordinator into the text box below (ICIS is limited to 1,000 characters)		